

Exhibit 1

Giles Declaration

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

FRIENDS OF THE EVERGLADES, INC., and
CENTER FOR BIOLOGICAL DIVERSITY,

Plaintiffs,

v.

KRISTI NOEM, in her official capacity as
Secretary of the UNITED STATES
DEPARTMENT OF HOMELAND SECURITY;
TODD LYONS, in his official capacity as Acting
Director of the UNITED STATES
IMMIGRATION AND CUSTOMS
ENFORCEMENT; KEVIN GUTHRIE, in his
official capacity as Executive Director of the
Florida Division of Emergency Management,
and MIAMI-DADE COUNTY, a political
subdivision of the State of Florida

Defendants.

Civil Action No. 1:25-cv-22896

DECLARATION OF THOMAS P. GILES

Pursuant to the authority of 28 U.S.C. § 1746, I, Thomas P. Giles, declare that, to the best of my knowledge, information, and belief, and under the penalty of perjury, the following is true and correct:

1. I am currently both the Acting Deputy Executive Associate Director (D-EAD) for the United States Department of Homeland Security (DHS), Immigration and Customs Enforcement

(ICE), Enforcement and Removal Operations (ERO) and the Interim Assistant Director for Field Operations within ERO. I have been the Acting D-EAD of ERO since June 30, 2025, and the Interim Assistant Director for Field Operations since May 2025.

2. As the Acting D-EAD of ERO, I oversee the mission of ERO's eight headquarters divisions: Enforcement, Removal, Non-Detained Management, Custody Management, Field Operations, ICE Health Service Corps, Law Enforcement Systems and Analysis, and Operations Support. As the interim Assistant Director for Field Operations, I oversee and direct all ERO field operations activities nationwide and ensure coordination among all ERO field offices. I have principal oversight over the full scope of immigration enforcement activities and programs through which ERO identifies, arrests, refers for prosecution, and removes illegal aliens from the United States.

3. I began my career in federal law enforcement in 2001 as a Deportation Officer in the Seattle field office and was eventually promoted to Supervisory Detention and Deportation Officer and Assistant Field Office Director. In 2012, I was selected to serve as a Deputy Chief of Staff for ERO at ICE headquarters in Washington, D.C., and the following year, I served as the Chief of Staff. Following that, I served as the Field Office Director for the Atlanta and Los Angeles ERO field offices. In the Los Angeles field office, I oversaw 505 authorized positions and managed an annual budget of \$110 million dollars. Prior to serving as the Acting Assistant Director for Field Operations, I served as the Assistant Director for the Non-Detained Management Division within ERO.

4. I am familiar with the allegations made by plaintiffs in the instant lawsuit regarding the detention facility being constructed at the Dade-Collier Training and Transition Airport near the Big Cypress National Preserve (TNT Detention Facility).

5. ICE is not providing any funding for the construction of the TNT Detention Facility. The State of Florida is responsible for the funding and construction of the facility. ICE's role concerning the development of the TNT Detention Facility has been limited to touring the facility to ensure compliance with ICE detention standards, and meeting with officials from the State of Florida to discuss operational matters.

6. The ultimate decision of who to detain at the TNT Detention Facility belongs to Florida.

7. If Florida decides to detain any illegal aliens at the TNT Detention Facility, they would do so under the authority delegated pursuant to section 287(g) of the Immigration and Nationality Act, codified at 8 U.S.C. § 1357(g).

8. Many Florida entities have entered 287g agreements since President Trump took office, including the Florida National Guard and several Florida law enforcement entities. Those agreements, including the date they were signed, are available on ICE's website. *See [participatingAgencies07012025pm.xlsx](#)*. The agreements generally authorize those entities to detain aliens under the immigration laws. ICE's understanding is that Florida intends to operate its 287(g) facilities under those existing agreements.

9. When ICE procures detention space from a state or local entity, it pays for that space via its appropriation for Operations and Support, which includes funding for enforcement, detention and removal operations. When it does so, the aliens are detained by a contractor on behalf of ICE.

10. ICE has not purchased or otherwise procured any detention space from Florida for the detention of illegal aliens at the TNT Detention Facility.

11. While the TNT Detention Facility is a concern of the State of Florida, its use in detaining aliens operationally benefits ICE as it will maximize detention capacity in furtherance of ICE's

immigration enforcement mission. Ultimately, the TNT Detention Facility will serve to decompress other detention facilities used to house aliens throughout the United States.

Signed this 2nd day of July, 2025.

**THOMAS P
GILES**

Digitally signed by THOMAS P GILES
DN: cn=THOMAS P GILES, o=U.S.
Government, ou=People,
email=Thomas.P.Giles@ice.dhs.gov,
c=US
Date: 2025-07-02T21:17:38-0400

Thomas P. Giles
Acting Deputy Executive Associate Director
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement